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VIA ECF

Magistrate Judge Robert M. Levy
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *United States v. Cherwitz, et al.*
Criminal Docket No. 23-cr-00146-DG-RML

Dear Judge Levy:

I am writing regarding the evidentiary hearing scheduled for April 29, 2025, at 10:30 am in Courtroom 11B. The hearing was set two days ago, and I was contacted by Ezra Landes yesterday. I am in the process of being retained, and I have submitted an application to appear pro hac vice.

I am requesting a continuation of the hearing to discuss the case with my client and to familiarize myself with the case and the protective order that has been entered in this case. I do not believe I can effectively represent Mr. Landes on this issue absent a continuance.

I request a continuance of 14 days, or to another nearby date convenient for the Court.

Counsel for defendants Cherwitz and Daedone do not oppose this request, but counsel for the government indicated that they do oppose.

Respectfully submitted,

/s Matthew Donald Umhofer
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